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8WD-SDU

Black Hills Group – Sierra Club
P.O. Box 1624
Rapid City, SD 57709
December 5, 2019

Ms. Valois Robinson
U.S. EPA Region #8
Mail Code: 8WD-SDU
1595 Wynkoop St.
Denver, CO 80202-1129

RE: Docket # EPA-RO8-OW-2019-0512

Dear Ms. Robinson:

I am writing you as the Chair of the Black Hills Group of the Sierra Club, affiliated with our South Dakota Chapter. The Sierra Club is the oldest and largest environmental organization in the world. The Black Hills Group represents roughly 400 families in western South Dakota. We are dedicated to protecting the land and water resources of the Black Hills region. Therefore, we have grave concerns about the Dewey-Burdock project on the southwest edge of the Black Hills.

We recognize that climate change will compound the negative impacts of uranium exploration and mining in the Black Hills in that the prodigious use of water for the Dewey-Burdock project will impact our region more severely as we adapt to a dryer climate. Conversely, if climate change continues to cause more severe flooding events, as has happened this year, the potential for contamination of surface water is heightened. The EPA should consider these climate impacts as the requested water permits are evaluated.

The EPA needs to consider the cumulative impacts of uranium exploration and mining on both sides of the South Dakota-Wyoming border. If both the Dewey-Burdock project and the Dewey Terrace project are approved, the impact on the Minnelusa aquifer and other groundwater and surface water resources are doubled. These adjacent projects both threaten the water resources of the Black Hills, a region that straddles the state line. Both South Dakota and Wyoming are in Region #8, and the EPA is in a position to consider and evaluate these adjacent uranium projects in conjunction with each other.

The requirement that Powertech begin construction within one year of the permit effective date needs to be maintained. If the permit is granted, and no work begins within a reasonable time, local citizens must remain vigilant against an ongoing threat as environmental conditions change. That places an unfair burden on Black Hills landowners and protectors of our precious water resources.

Before any exploration or mining begins, Powertech should be required to identify and plug all old boreholes on the Dewey-Burdock site. These boreholes make the entire site very porous, and increase the danger of contamination of groundwater formations.

We are very concerned about any change in permit conditions that allows Powertech to self-monitor. Actual physical monitoring of potential water contamination is far more useful than mathematical extrapolation, and Powertech should not be given the “benefit of the doubt” where long-term impacts on water quality are concerned. In particular, it is vital that the EPA test the Minnelusa aquifer before issuing any final permit to Powertech. If there will eventually be four deep disposal wells in the

Dewey-Burdock project, all four should be included in the permit initially. A permit should not be issued for just two deep disposal wells if it is foreseeable that two more will be added later in the life of the project.

Finally, we support the maintenance of a wide buffer zone between the injection and production wells and the project area boundary. Where the protection of our precious water resources is concerned, the EPA should err on the side of caution, recognizing that, in periods of abnormally high precipitation, contaminants may well migrate further than anticipated.

This summarizes some of the major concerns that our organization has about the Dewey-Burdock project. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in cursive script, reading "Sandra Seberger".

Sandra Seberger
Chair, Black Hills Group